

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Gulf South Pipeline Company LP
Bistineau Compressor Station
Ringgold, Bienville Parish, Louisiana
Agency Interest Number: 7832
Activity Number: PER20070001
Proposed Permit Number: 0360-00007-V2**

I. APPLICANT

Company:

Gulf South Pipeline Company LP
P.O. Box 8288
Longview, Texas 75607

Facility:

Bistineau Compressor Station
540 United Gas Rd
Ringgold, Bienville Parish, Louisiana 71068
Approximate UTM coordinates are 466.3 kilometers East and 3582.3 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

The Bistineau Compressor Station is a typical dehydration-compressor facility also employing underground storage. The raw gas is brought in directly to the station and put into storage. During the peak demand seasons, the gas is compressed out of the underground wells, as needed, and sent through either the dehydration plant or the glycol plant. In the dehydration plant, the gas is sent through one of three drying towers packed with silica to remove the moisture and collect off the condensate. These towers are a completely enclosed system. Four heaters heat the gas. Each heater is rated for 4 MM BTU/hr. The heaters for the glycol unit are similar to those for the dehydration plant. The controlled dehydrator (H-5.5; EQT 018) meets the requirements of the glycol rule with the use of a BTEX condenser. The uncontrolled heaters (H-6.5; EQT 020 and H-7.5; EQT 022) are limited to 770 hours/year to meet the 9 tons per year exemption. Five compressors are in use, three rated at 6000 HP (C-1 through C-3) and two at 8000 hp (C-4 and C-5). All are reciprocating, gas driven engines. Three (3) condensate tanks are in use such that the flow could go through any or all of the tanks.

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Gulf South Pipeline Company LP - Bistineau Compressor Station is a designated Part 70 source. The current Part 70 permit which has been issued to the facility is as follows:

Permit No.	Unit or Source	Date Issued
0360-00007-V1	Bistineau Compressor Station	12/5/2005

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application was submitted on December 17, 2007 requesting a Part 70 operating permit renewal for the Bistineau Compressor Station. Additional information dated June 2, 2008 was also submitted.

Project

Gulf South Pipeline Company LP would like to include the following changes in this renewal:

- Incorporate case-by-case insignificant activities
- Update emissions

Proposed Permit

Permit 0360-00007-V2 will be the renewal/modification of Part 70 operating permit 0360-00007-V1 for the Bistineau Compressor Station.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	55.88	56.19	+0.31
SO ₂	0.77	0.77	-
NO _x	3691.09	3691.09	-
CO	1562.54	1562.57	+0.03
VOC	257.19	255.25	-1.94

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Acetaldehyde	0.95	0.97	+0.02
Acrolein	0.61	0.65	+0.04
Benzene	4.04	4.09	+0.05

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VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Ethylbenzene	0.66	0.66	-
Formaldehyde	29.34	29.43	+0.09
n-Hexane	7.54	7.49	-0.05
Toluene	2.98	3.04	+0.06
2,2,4-Trimethylpentane	-	0.03	+0.03
Xylene	2.40	2.43	+0.03
Total	48.52	48.79	+0.27

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

See section XI table 2 of permit.

Prevention of Significant Deterioration/Nonattainment Review

This application was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Non-attainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) do not apply. This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Formaldehyde, acetaldehyde, and acrolein emissions are from natural gas fired engines. Therefore, these emissions are exempt from the Louisiana Air Toxics Regulations. The facility is a major source of Hazardous Air Pollutants under the federal program.

Streamlined Equipment Leak Monitoring Program

None

MACT Requirements

None

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Air Quality Analysis

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

None

VI. PERIODIC MONITORING

All periodic monitoring is conducted in accordance with state and federal regulations. See the Specific Requirements Section of the proposed permit for monitoring requirements.

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

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Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.